

KATHLEEN BLISS LAW PLLC
1070 W. HORIZON RIDGE PKWY., SUITE 202
HENDERSON NEVADA 89012
TEL – 702.463.9074

MICHAEL ANTHONY HERNANDEZ
CA Bar No. 234579
Michael@DefenseAttorneySD.com
Michael Anthony Hernandez, APC
501 West Broadway, Suite 1360
San Diego, CA 92101
Telephone: 619.341.3149
Attorney for Maria Mandujano Sanchez (admitted pro hac vice)

JACQUELINE TIRINNANZI, ESQ.
NV Bar No. 13266
jt@kathleenblisslaw.com
KATHLEEN BLISS LAW PLLC
1070 W. Horizon Ridge Pkwy., Suite 202
Henderson, Nevada 89012
Telephone: 702.463.9074
Local Counsel

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARIA MANDUJANO SANCHEZ,

Defendant.

CASE NO. 2:21-cr-00328-GMN-DJA

**STIPULATION AND [REDACTED] ORDER
TO CONTINUE SENTENCING
(First Request)**

Maria Mandujano Sanchez, by and through counsel of record Michael Anthony Hernandez, and the United States of America, by and through Assistant United States Attorney Allison Reese, hereby stipulate and request that the Court vacate Ms. Mandujano Sanchez's sentencing hearing currently set for June 8, 2022, at 10:00 a.m. and continue it to a later date convenient to the Court, but no sooner than sixty (60) days. This stipulation is made and based upon the following:

1. The parties agree to the continuance.

KATHLEEN BLISS LAW PLLC
1070 W. HORIZON RIDGE PKWY., SUITE 202
HENDERSON NEVADA 89012
TEL – 702.463.9074

2. On March 2, 2022, Ms. Mandujano Sanchez pleaded guilty to one count of Importation of a Controlled Substance (cocaine) in violation of 21 U.S.C. §§ 952 and 960. ECF No. 15.
3. Defense counsel’s ability to effectively and thoroughly explore all factors relevant to Ms. Mandujano Sanchez’s mitigation and sentencing presentation requires additional time to prepare.
4. Ms. Mandujano Sanchez is in custody and agrees to the proposed continuance.
5. The additional time requested by this stipulation is reasonable pursuant to Fed. R. Crim. P. 32(b)(2), which states that, “the court may, for good cause, change any time limits prescribed [for sentencing] in this rule.” Furthermore, a delay in sentencing does not implicate or undermine the defendant’s speedy trial rights under the United States Constitution. *See Betterman v. Montana*, 136 S.Ct. 1609, 1617-18 (2016).
6. This is the first request for a continuance of the sentencing. The additional time requested herein is not sought for purposes of delay.
7. Denial of this request for a continuance would deny counsel for Ms. Mandujano Sanchez sufficient time to effectively and thoroughly prepare for sentencing, taking into account due diligence. Accordingly, a denial of this request for continuance could result in a miscarriage of justice.

Dated May 27, 2022.

/s/ Allison Reese
ALLISON REESE, ESQ.
Assistant U.S. Attorney

/s/ Michael Anthony Hernandez
MICHAEL ANTHONY HERNANDEZ, ESQ.
Counsel for Maria Mandujano Sanchez

/s/ Jacqueline Tirinnanzi
JACQUELINE TIRINNANZI, ESQ.
Local Counsel for Maria Mandujano Sanchez

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARIA MANDUJANO SANCHEZ,

Defendant.

CASE NO. 2:21-cr-00328-GMN-DJA

**STIPULATION AND ~~PROPOSED~~ ORDER
TO CONTINUE SENTENCING
(First Request)**

FINDINGS OF FACT

1. The parties agree to the continuance.
2. On March 2, 2022, Ms. Mandujano Sanchez pleaded guilty to one count of Importation of a Controlled Substance (cocaine) in violation of 21 U.S.C. §§ 952 and 960. ECF No. 15.
3. Defense counsel's ability to effectively and thoroughly explore all factors relevant to Ms. Mandujano Sanchez's mitigation and sentencing presentation requires additional time to prepare.
4. Ms. Mandujano Sanchez is in custody and agrees to the proposed continuance.
5. The additional time requested by this stipulation is reasonable pursuant to Fed. R. Crim. P. 32(b)(2), which states that, "the court may, for good cause, change any time limits prescribed [for sentencing] in this rule." Furthermore, a delay in sentencing does not implicate or undermine the defendant's speedy trial rights under the United States Constitution. *See Betterman v. Montana*, 136 S.Ct. 1609, 1617-18 (2016).
6. This is the first request for a continuance of the sentencing. The additional time requested herein is not sought for purposes of delay.
7. Denial of this request for a continuance would deny counsel for Ms. Mandujano Sanchez

1 sufficient time to effectively and thoroughly prepare for sentencing, taking into account
2 due diligence. Accordingly, a denial of this request for continuance could result in a
3 miscarriage of justice.

4 **CONCLUSION OF LAW**

5
6 For all the above-stated reasons, the ends of justice are served by granting the requested
7 continuance for the following reasons: Additional time requested by this stipulation is reasonable
8 pursuant to Fed. R. Crim. P. 32(b)(2), which states that the “court may, for good cause, change
9 any time limits prescribed [for sentencing] in this rule.” Furthermore, a delay in sentencing does
10 not implicate or undermine the defendant’s speedy trial rights under the United States
11 Constitution. *See Betterman v. Montana*, 136 S.Ct. 1609, 1617-18 (2016). Failure to grant the
12 continuance would deny parties sufficient time to meaningfully continue to prepare for
13 sentencing, considering the exercise of due diligence. Accordingly, a denial of this request for
14 continuance could result in a miscarriage of justice.
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARIA MANDUJANO SANCHEZ,

Defendant.

CASE NO. 2:21-cr-00328-GMN-DJA

**STIPULATION AND ~~PROPOSED~~ ORDER
TO CONTINUE SENTENCING
(First Request)**

Based upon the stipulation of the parties, and good cause appearing, it is hereby ORDERED that Ms. Mandujano Sanchez's sentencing hearing set for June 8, 2022, hereby is, VACATED.

IT IS FURTHER ORDERED that the sentencing hearing is reset for August 10, 2022, at the hour of 10:00 AM in courtroom 7D.

Dated this 1 day of June 2022.


THE HONORABLE GLORIA M. NAVARRO
UNITED STATES DISTRICT JUDGE

KATHLEEN BLISS LAW PLLC
1070 W. HORIZON RIDGE PKWY., SUITE 202
HENDERSON NEVADA 89012
TEL - 702.463.9074